

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JAMES HURT JR.,

Plaintiff,

-against-

THE CITY OF NEW YORK, et al.,

**DECLARATION OF
ANGHARAD WILSON IN
SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS**

15-cv-7612

Defendants.

Hon. P. Kevin Castel

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ANGHARAD WILSON, for her declaration pursuant to 28 U.S.C. §1746, states:

1. I am an Assistant Corporation Counsel at the New York City Law Department and I am lead counsel for the City in this case. I make this declaration in support of defendants' motion to dismiss the complaint. I am fully familiar with the matters set forth below.

2. Attached to this declaration are the following exhibits:

<u>Exhibit A</u>	Interview Details of the Interview of James Hurt Jr. by CCRB
<u>Exhibit B</u>	Referral Worksheet from IAB to CCRB
<u>Exhibit C</u>	CCRB Investigative Recommendations
<u>Exhibit D</u>	Bronx Anti-Crime Roll Call for July 1, 2014
<u>Exhibit E</u>	Excerpt from the Deposition of Officer Frank Siciliano
<u>Exhibit F</u>	Bronx Court Electronic Sign-in Record
<u>Exhibit G</u>	NYPD Patrol Guide Section 211-05

<u>Exhibit H</u>	Sergeant Connizzo Memobook Entries
<u>Exhibit I</u>	Officer Siciliano Memobook Entries
<u>Exhibit J</u>	July 12, 2017 Affidavit of Michael Joy
<u>Exhibit K</u>	July 13, 2017 Affidavit of Pierre Barbee
<u>Exhibit L</u>	February 3, 2017 Declaration of Desmond Power
<u>Exhibit M</u>	Redacted Cellular Records for Sergeant Connizzo
<u>Exhibit N</u>	Excerpt of Plaintiff's Deposition Transcript
<u>Exhibit O</u>	Photograph of Sergeant Connizzo
<u>Exhibit P</u>	June 30, 2015 Letter from CCRB to Samuel Cohen, Esq.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York, on November 20, 2017

/s/
ANGHARAD K. WILSON (AW 1714)
Senior Counsel